UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re:

Bankruptcy Case No. 13-53846

City of Detroit, Michigan,

Honorable Thomas J. Tucker

Debtor.

Chapter 9

REPLY IN SUPPORT OF DEBTOR'S TWENTIETH OMNIBUS OBJECTION TO CERTAIN CLAIMS

The City of Detroit ("<u>City</u>"), by its undersigned counsel, files this reply in support of its *Twentieth Omnibus Objection to Certain Claims* ("<u>Objection</u>," Doc. No. 10776), stating as follows:

On February 26, 2016, the City filed its Objection. On March 25, 2016, Julius Collins filed a response to the Objection. [Doc. No. 10952.] The deadline to file a response to the Objection was March 23, 2016. Consequently, the response filed by Collins was not timely filed and should be overruled. *See* Local Bankruptcy Rule 3007-1(b) & (c). The City thus asks the Court to sustain its Objection as to this claim.

Dated: March 25, 2016

Respectfully submitted,

By: /s/ Marc N. Swanson

Jonathan S. Green (P33140) Marc N. Swanson (P71149)

Marc N. Swanson (P/1149)

MILLER, CANFIELD, PADDOCK AND

STONE, P.L.C.

150 West Jefferson, Suite 2500

Detroit, Michigan 48226

Telephone: (313) 496-7591

Facsimile: (313) 496-8451 green@millercanfield.com

swansonm@millercanfield.com

and

Charles N. Raimi (P29746)

Deputy Corporation Counsel

City of Detroit Law Department

2 Woodward Avenue, Suite 500

Coleman A. Young Municipal Center

Detroit, Michigan 48226

Telephone: (313) 237-5037

Facsimile: (313) 224-5505

raimic@detroitmi.gov

ATTORNEYS FOR THE CITY OF DETROIT